



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D.
SECRETARY

March 2, 2006
CERTIFIED MAIL (7003 2260 0001 2753 3917)
RETURN RECEIPT REQUESTED

Mr. Dennis Fec
Manager - Environmental Health and Safety Services
Georgia Gulf Chemicals and Vinyls
26100 Highway 405 South
Post Office Box 629
Plaquemine, LA 70765-0629

RE: Georgia Gulf Chemicals and Vinyls
(LAD 057 117 434, A1# 2455)
Trial Burn Plan for Incinerator 662, Industrial Furnace
Activity #PER 20000002

Dear Mr. Fec:

The Louisiana Department of Environmental Quality (LDEQ) has completed a review of your Trial Burn Plan for Incinerator 662, Revision 1, dated January 2006. The Louisiana Department of Environmental Quality conditionally approves the Trial Burn Plan for Incinerator 662 provided Georgia Gulf completes the following:

1. The calibration of the continuous monitoring system (CMS) must be performed prior to the Trial Burn in accordance with the instrumentation procedures. Georgia Gulf must submit preliminary results of the calibration to LDEQ before commencement of the Trial Burn.
2. Within fourteen (14) days of receipt of this letter, Georgia Gulf must submit to the LDEQ Permits Division a schedule for the commencement and completion of the Trial Burn

ENVIRONMENTAL ASSESSMENT

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3. Within fourteen (14) days of receipt of this letter, Georgia Gulf must contact Ms. Esther Coleman with the Environmental Protection Agency (EPA) in Region 6, and request VOST audit materials for the start of the Trial Burn.
4. Within fourteen (14) days of receipt of this letter, Georgia Gulf must submit to the LDEQ Permits Division a listing of all existing Incinerator 662 permitted pollution control parameters with the existing control limits and the targeted operational limits during Trial Burn Conditions 1 and 2.
5. Within (14) days of receipt of this letter and prior to commencing the Trial Burn, Georgia Gulf shall submit the Quality Assurance Project Plan (QAPP) signed by the personnel listed on page 1 of the QAPP to LDEQ. Georgia Gulf must also submit documentation that all subcontractors and laboratories have read and understand the provisions of the QAPP. This documentation must include a signed verification statement from the project manager for each of the subcontractors or laboratories.
6. Georgia Gulf must make the Trial Burn Plan available to the public for review at the West Baton Rouge Parish Library, 830 North Alexander, Port Allen, Louisiana 70767-2327 and Iberville Parish Library, Headquarters, 24605 J. Gerald Beret Boulevard, Plaquemine, LA 70764-0736. Written verification that the plans have been provided to the library must be submitted to the Permits Division.
7. In accordance with LAC 33:V.537.B.2.g, LDEQ will provide a notice to all persons on the mailing list and the appropriate units of state and local government announcing the scheduled commencement and completion dates for the approved test burn. The public notice must be provided within a reasonable period of time before actual testing begins. In accordance with 40 CFR 63.1207 (e)(2), Georgia Gulf must issue a public notice announcing the approval of the Trial Burn Plan and the location where the Trial Burn Plan is available for review. These two public participation actions will be performed simultaneously.
8. For the period prior to initiation of approved testing, Georgia Gulf will be allowed to operate in accordance with its proposed Trial Burn conditions. This time is not to exceed 720 hours operating time when burning hazardous waste.
9. All stack testers and laboratories, including subcontractors, must be accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) for all sampling and analytical methods, and all analytes.
10. The Trial Burn results shall be reported in the LDEQ Trial Burn Format. This may be downloaded from the LDEQ website at www.deq.louisiana.gov/portal/tabid/135/Default.aspx.

11. Any leftover spiking materials are to be disposed of in accord with appropriate state and federal regulations.

The report shall be submitted to Mr. Donelson R. Caffery, Jr., P.E., Engineering Group 3. Two paper copies and three electronic copies of the report shall be required. All paper copies shall be two-sided. It is the facility's responsibility to supply EPA and parish libraries with a paper copy of the report.

Electronic copies shall be provided on CDs. All the information contained in the report, including appendices, must be on the CDs. All files shall be provided in PDF format. The main body of the report shall constitute one file, with the option of providing the tables in the same or a separate file. Each appendix shall constitute a separate file. In case an appendix is too large for one file (such as Appendix I, data packages), the appendix may be broken into several files.

Files shall be named in a descriptive manner. File names shall give an indication as to the content of the file. An example of such a name would be: Unit 3 Report Narrative.pdf or Unit 3 Report Appendix A.pdf. File names for the data packages may either coincide with the names of the paper copy volumes (i.e., Unit 3 Report Appendix 1 Vol 1.pdf, Unit 3 Report Appendix 1 Vol 2.pdf, etc.) or be descriptive of the samples in the data package (i.e., Unit 3 Stack Metals.pdf, Unit 3 Feed Ash.pdf, etc.).

Please include your Agency Interest Number (2455), and Activity Number (PER20000002, Task 1873986). If you have any questions regarding the Notice of Deficiencies, please contact Charles Handrich at (225) 219-3452.

Sincerely,



Wilbert F. Jordan, Jr.
Assistant Secretary
Louisiana Department of Environmental Quality

Ch

c: Kishor Fruitwala, Ph.D., EPA Region 6
Ms. Esther Coleman, EPA, Region 6